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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
All Actions

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF META'S
NOTICE OF SUPPLEMENTAL
AUTHORITY ON META'S MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
BRIEFING ON FORMER EMPLOYEES'
OBJECTIONS TO META'S DOCUMENT
SUBPOENA IN LIEU OF PROPOSED
ORDER [ECF No. 1815]**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley M. Simonsen, declare and state as follows:

1. I am an attorney with the law firm Covington & Burling, LLP and represent Defendants Meta Platforms, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc. (collectively, “Meta”) in the above-captioned case. The declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. On April 18, 2025, Plaintiffs in the parallel Judicial Council Coordination Proceeding No. 5255, pending in the Superior Court of the State of California, Los Angeles, disclosed Arturo Bejar and Vaishnavi Jayakumar as witnesses not retained as experts but “whose testimony may include information that could be considered ‘expert testimony,’” and who are expected to testify ... consistent with the deposition testimony previously given in this action.” Attached hereto as **Exhibit A** is a true copy of Plaintiffs’ disclosure.

3. On March 20, 2025, I appeared at the Court’s Discovery Management Conference (“DMC”) and offered argument on joint letter briefing regarding Mr. Bejar and Ms. Jayakumar’s objections to Meta’s document subpoenas issued to them. Attached hereto as **Exhibit B** are highlighted excerpts of a true copy of the transcript of the DMC. The transcript erroneously states that Michael Ward, counsel for Mr. Bejar and Ms. Jayakumar, spoke at the highlighted excerpt included in Exhibit B beginning at page 104. I was present for this argument and recall that counsel for Plaintiffs, Previn Warren, spoke at the portions indicated, not Mr. Ward.

* * *

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on April 22, 2025.

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen